

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

- - - - - x  
:  
UNITED STATES OF AMERICA : Hon. Katharine S. Hayden  
:  
:  
- v. - : Cr. No. 03-844  
:  
TEWHAN BUTLER, :  
a/k/a "Massacre," :  
a/k/a "Mass," : 18, U.S.C., Sections  
a/k/a "Bloody Mass," : 1962(c), 1962(d), 371,  
a/k/a "Mubini," : 922(a)(1)(A), 924(c),  
a/k/a "101," : 924(i), 924(l), 1959  
a/k/a "Superior," : (a)(1), (a)(3), (a)(5),  
QUADREE SMITH, : and (a)(6) and 2;  
a/k/a "Trouble," : 21, U.S.C., Sections  
a/k/a "Nuff" : 841 and 846  
a/k/a "Syheem Littlejohn," :  
a/k/a "Raheem Sparks," :  
a/k/a "Jay," :  
a/k/a "105," :  
a/k/a "Five-Star General," :  
TITO STRONG, :  
a/k/a "Bido," :  
a/k/a "Big Bido," :  
a/k/a "102," :  
RAHMAN NICHOLS, :  
a/k/a "Rock," :  
a/k/a "Minister of :  
Information," :  
AMIR WINN, :  
a/k/a "Young Gangster," :  
a/k/a "Y.G.," :  
CALVIN DAVIS, :  
a/k/a "Calione," :  
a/k/a "Balione," :  
DAVID ALSTON, :  
a/k/a "Floco," :  
STEVEN BUTLER, :  
a/k/a "Beezo," :  
a/k/a "Steezo," :  
SAMIR MOSES, :  
a/k/a "Spit Vicious," :  
a/k/a "S.P.V.," :  
a/k/a "S.P." :  
BAATIN MORGAN, :  
a/k/a "Baatin Hargrove," :  
a/k/a "Bat," :  
ANTHONY WARD, :  
a/k/a "P.B.," :

a/k/a "Problem Child,"	:
NASIR JOHNSON,	:
a/k/a "Bloody Nas,"	:
a/k/a "Nas,"	:
JABIR JONES,	:
a/k/a "Hova,"	:
TIEHEEN SMITH,	:
a/k/a "X,"	:
ROBERT SINGLETON,	:
a/k/a "B.R."	:
a/k/a "Lieutenant,"	:
HOWARD WRIGHT	:
a/k/a "Affateen Bey,"	:
a/k/a "Murder,"	:
JAMAR HURD,	:
a/k/a "Fox"	:
a/k/a "Lieutenant,"	:
TERRANCE OLIVER,	:
a/k/a "Big Red,"	:
a/k/a "Sergeant,"	:
CHYQUIN AUSTIN,	:
a/k/a "Q.B."	:
a/k/a "Little Homie," and	:
JAMES DILLARD.	:
- - - - -	x

**SUPERSEDING INDICTMENT**

The Grand Jury in and for the District of New Jersey,  
sitting at Newark, charges:

COUNT ONE  
(Racketeering Conspiracy)

1. At all times relevant to this Superseding Indictment,  
in the District of New Jersey and elsewhere, defendants TEWHAN  
BUTLER, a/k/a "Massacre," a/k/a "Mass," a/k/a "Bloody Mass,"  
a/k/a "Mubini," a/k/a "101," a/k/a "Superior," QUADREE SMITH,  
a/k/a "Trouble," a/k/a "Nuff," a/k/a "Syheem Littlejohn," a/k/a  
"Raheem Sparks," a/k/a Jay," a/k/a "105," a/k/a "Five-Star  
General," TITO STRONG, a/k/a "Bido," a/k/a "Big Bido," a/k/a  
"102," RAHMAN NICHOLS, a/k/a "Rock," a/k/a "Minister of

Information," AMIR WINN, a/k/a "Young Gangster," a/k/a "Y.G.," CALVIN DAVIS, a/k/a "Calione," a/k/a "Balione," DAVID ALSTON, a/k/a "Floco," STEVEN BUTLER, a/k/a "Beezo," a/k/a "Steezo," SAMIR MOSES, a/k/a "Spit Vicious," a/k/a "S.P.V." a/k/a "S.P.," ANTHONY WARD, a/k/a "P.B.," a/k/a "Problem Child," NASIR JOHNSON, a/k/a "Bloody Nas," a/k/a "Nas," TIEHEEN SMITH, a/k/a "X," ROBERT SINGLETON, a/k/a "B.R.," a/k/a "Lieutenant," JAMAR HURD, a/k/a "Fox," a/k/a "Lieutenant," as well as Baatin Morgan, a/k/a "Baatin Hargrove," a/k/a "Bat," Jabir Jones, a/k/a "Hova," Howard Wright, a/k/a "Affateen Bey," a/k/a "Murder," Terrance Oliver, a/k/a "Big Red," a/k/a "Sergeant," and Chyquin Austin, a/k/a "Q.B.," a/k/a "Little Homie," and others, were members and associates of a criminal organization that, at times, was known and referred to, as the Double II Set of the Bloods street gang, "Double II," "Double I" or "II" (hereinafter "Double II Set"). Members and associates of this criminal organization engaged in acts of violence, including murder, attempted murder, conspiracy to commit murder, robbery, arson, narcotics distribution, witness intimidation and other offenses.

2. The Double II Set, including its leadership, membership and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. This enterprise was engaged in and its activities affected interstate commerce. Additionally, this enterprise constituted an ongoing organization whose members

and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

#### Background of the Double II Set

3. In the early 1970s, a street gang that went by the name of "the Bloods," was formed in Los Angeles, California. As time passed, the Bloods spread to areas surrounding Los Angeles and other locations, and broke into individual units or "sets," each identified or affiliated with a certain street, neighborhood or area.

4. One such Bloods set based in Inglewood, California was called the Queen Street Bloods Gang, or QSBG.

5. In or about 1993, two individuals representing themselves to be members of the Queens Street Bloods Gang traveled to the area of 18<sup>th</sup> and William Streets in East Orange, New Jersey and advocated that certain individuals in that area, including several of the defendants and their coconspirators, should become members of, learn about, and align themselves with, the QSBG and more generally with the Bloods.

6. As a result, several of the existing gangs in and around East Orange, New Jersey, such as the Gutter Rats, the Drama Lords, the Steel Click crew and the Chain Gang began to unify into a single entity called Double II, or the Double II Set, the name of which represents the union of Inglewood, California and "Illtown," an area nickname for East Orange, New Jersey.

7. In the years after its creation in 1993, the Double II Set was aligned with, and abided by, the practices of the Bloods in California, particularly the QSBG. Over time, the Double II Set has incorporated many of the rules and protocols of the United Bloods Nation, more commonly known as the "East Coast Bloods."

The Double II Set Joins the United Bloods Nation

8. In 1993, the same year that the Double II Set was formed in East Orange, New Jersey, the United Bloods Nation (hereinafter "UBN") was created by, among others, an individual named Omar Portee, also known as "OG Mac," while he was incarcerated at the Rikers Island Correctional Facility in New York City.

9. Between 1993 and the present, the UBN has spread to many areas in the northeastern United States, including New York and New Jersey, and currently maintains several sets in the area of Newark and East Orange, including "Gangster Killer Bloods," or "GKB," "Nine-Three," formerly known as "Nine-Trey," "Brims" and "Sex, Money, Murder."

10. In about 2001, the Double II Set adopted many of the rules and protocols of the UBN and incorporated them into its existing west-coast practices.

11. The UBN in general, and the Double II Set in particular, has followed and continues to follow many of the same practices as the Bloods on the west coast, including:

a. an identification with the color red, which appears prominently in clothing, hats and bandanas worn by Blood members on both the east and west coasts;

b. a long-term and often lethal rivalry with the Crip gang, whose signature color is blue;

c. the sub-division of the gang into individual units called sets, which are generally headed by an "OG" or "Original Gangster," or a "101," and are typically aligned with different areas or neighborhoods.

12. In addition, many of the UBN sets have adopted the names of west coast sets, such as "PIRU" and "Brim," as a way of acknowledging or showing respect to their west coast forebearers.

13. It is common for members of the UBN to learn and be questioned about the history of the west coast and east coast Bloods; failure to recite this history to the satisfaction of a superior could result in a member being disciplined; examples of this history are as follows:

a. defendant TEWHAN BUTLER, as a leader of the Double II Set, distributed written materials under the name "Bloody Mass," to members and associates of the Double II Set about the history of the UBN;

b. these written materials provided, in substance and in part, that:

i. the original west coast Bloods sets included PIRU, Black P Stone Rangers, Bounty Hunters, Rollin' 20s and Westside Harbor;

ii. OG Mac brought the UBN to New York in 1993;  
and

iii. the original Bloods sets on the east coast included 59 Brims, GKB (Gangster Killer Bloods), 9-Trey Gangsters, Valentine and Blood Stone Villain.

14. Members of the UBN often use a system of verbal codes and hand signals to communicate with each other and to signify their association with the Bloods or a Set of the Bloods;

a. for example, distinct hand signals have been established for the Bloods, for the QSBG Set of the Bloods, and for the Double II Set of the Bloods;

b. the following are examples of verbal codes used by Bloods, and particularly by members of the Double II Set:

i. "550" refers to a "neutral" or someone who is neither a Blood nor rival gang member;

ii. "Erickets" means enemy;

iii. "Put in work" means to commit an act of violence, which may include murder;

iv. "Bulletproof" refers to a person who is affiliated or associated with the Bloods but not a formal member;

v. "031" means "I have love for my Bloods;" and

vi. "Crab" or "Brab" is a derogatory term for a member of rival Crip gang;

c. one of the functions of the verbal codes and hand signals is to distinguish true Bloods members from individuals who falsely represent themselves to be Bloods members, a practice known as "false flagging."

15. The rules and regulations governing the Bloods, including members of the Double II Set, required members to cross out the letter "C" whenever they wrote the letter. This was done to show disrespect for members of the rival "Crip" gang.

16. Members of the Double II Set often have tattoos on their skin signifying their association with either the Bloods generally or specifically with the Double II Set; examples of such tattoos include the following:

i. "ii" or "II" signifies association with the Double II Set;

ii. "235" signifies association with the Double II set; and

iii. "CK stands for "Crip killer" and signifies association with the Bloods;

17. The UBN, including the Double II Set, also created and maintains a system of rules and regulations governing the Bloods, its membership, and entry into the Bloods; these regulations establish a hierarchical membership structure;

a. in regard to the hierarchical structure of the



Double II Set, defendant TEWHAN BUTLER distributed to Double II members and associates materials creating the following formal positions within the Set:

- i. OG - Original Gangster,
- ii. 101 - Leader of the Set,
- iii. 102 - Second in Command,
- iv. 103 - Minister of Defense,
- v. 104 - Minister of Information,
- vi. 105 - Five Star General,
- vii. 106 - Head of Command
- viii. 107 - Second in Command,
- ix. 108 - First Lieutenant,
- x. 109 - Little Homie,
- xi. 110 - Baby Gangster, also known as  
"Blood Drop,"

b. the positions of "OG" through "110" are sometimes referred to as "status positions;"

c. The "OG" of the Double II Set was a member of QSBG, who traveled to East Orange and established the Double II Set in 1993;

d. the "101," also known as "the Superior," was the set's leader, defendant TEWHAN BUTLER; the "102" was, at times, defendant TITO STRONG; and the "105," also known as "the Five-Star General," was defendant QUADREE SMITH; at various times,

defendant RAHMAN NICHOLS held the position of "Minister of Defense;" within the Double II Set, the position of "105" or "Five-Star General" was second in authority only to the "101;"

e. due to the large number of Double II Set members incarcerated in recent years, defendant TEWHAN BUTLER established dual hierarchies, one pertaining to the Double II members in prison, and a second for those who were not in prison; defendant TEWHAN BUTLER remained the overall leader of the Double II Set, and continued to run the set's affairs from prison.

18. The protocols governing entry into the Bloods, or elevation of an existing member, sometimes involved the commission of violence against another person, especially against a rival gang member such as a Crip member; these acts of violence were sometimes referred to as "putting in work," and were uniformly held in high regard by Bloods members.

19. In addition to "putting in work," one could become a member of the Bloods by being "beaten in" by one or more fellow Bloods members for 31 seconds, referred to as a "31."

20. The rules governing the Bloods also established penalties for those who violated the rules and/or "disrespected" higher ranking members of the Bloods. Such penalties included (a) being stripped of one's status within the Bloods, (b) being placed on probationary status within the Bloods, and/or (c) being

labeled "food." All members of the Bloods were directed to violently attack and/or kill any person labeled as "food."

21. The criminal activity of the Bloods and of the Double II Set included the protection and maintenance of territory over which the gang claims control. The members and associates of the Double II Set mark their territory by using specially "tagged" graffiti, including the following:

- a. "ii,"
- b. "CK" (Crip Killer),
- c. a five pointed star signifying the Bloods' association with the People's Nation,
- d. three dots in the shape of a triangle, and
- e. "Bloods rule."

#### Roles of the Defendants

22. The defendants participated in the operation and management of the Double II Set; specifically, at times relevant to this Superseding Indictment:

- a. defendants TEWHAN BUTLER and QUADREE SMITH were leaders of the Double II Set, and directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise's affairs;

b. defendants TITO STRONG, RAHMAN NICHOLS, JAMAR HURD, TERRANCE OLIVER, ROBERT SINGLETON and CHYQUIN AUSTIN at times held "status positions" in the Double II Set, and were responsible for furthering the affairs of the enterprise;

c. defendants AMIR WINN, CALVIN DAVIS, DAVID ALSTON, STEVEN BUTLER, SAMIR MOSES, BAATIN MORGAN, ANTHONY WARD, NASIR JOHNSON, and TIHEEN SMITH, were members or associates of the Double II Set, and under the direction of its leadership, each such defendant participated in unlawful and other activities in furtherance of the conduct of the enterprise's affairs;

The Racketeering Conspiracy

23. From in or about 1993 until about October 14, 2004, within the District of New Jersey and elsewhere, defendants

TEWHAN BUTLER,  
a/k/a "Massacre,"  
a/k/a "Mass,"  
a/k/a "Bloody Mass,"  
a/k/a "Mubini,"  
a/k/a "101,"  
a/k/a "Superior,"  
QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"  
TITO STRONG,  
a/k/a "Bido,"  
a/k/a "Big Bido,"  
RAHMAN NICHOLS,  
a/k/a "Rock,"  
a/k/a "Minister of Information,"  
AMIR WINN,  
a/k/a "Young Gangster,"  
a/k/a "Y.G.,"  
CALVIN DAVIS,

a/k/a "Calione"  
a/k/a "Balione,"  
DAVID ALSTON,  
a/k/a "Floco,"  
STEVEN BUTLER,  
a/k/a "Beezo,"  
a/k/a "Steezo,"  
SAMIR MOSES,  
a/k/a "Spit Vicious,"  
a/k/a "S.P.V.,"  
a/k/a "S.P.,"  
ANTHONY WARD,  
a/k/a "P.B.,"  
a/k/a "Problem Child,"  
NASIR JOHNSON,  
a/k/a "Nas,"  
a/k/a "Bloody Nas,"  
TIEHEEN SMITH,  
a/k/a "X,"  
ROBERT SINGLETON,  
a/k/a "B.R.,"  
a/k/a "Lieutenant," and  
JAMAR HURD,  
a/k/a "Fox,"  
a/k/a "Lieutenant,"

and others, being persons employed by and associated with the Double II Set, which engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully, knowingly and intentionally conspired to violate Title 18, United States Code, Section 1962(c), that is to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise, through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5).

24. The pattern of racketeering activity through which the defendants agreed to conduct the affairs of the enterprise consisted of the acts set forth in Racketeering Acts One through

Thirty-Five, as set forth in Count Two of this Superseding Indictment, which are incorporated as if fully set forth herein. It was a further part of the conspiracy that the defendants agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

#### Purposes Of The Enterprise

25. The purposes of the enterprise included the following:

a. enriching the members and associates of the enterprise through, among other things, acts in violation of the laws of the United States and the State of New Jersey involving murder, robbery, threats of violence, narcotics trafficking, and intimidation of witnesses;

b. preserving and protecting the power of the enterprise, and its members and associates, both in and out of prison, through the use of acts in violation of the laws of the United States and the State of New Jersey involving murder, robbery, threats of violence, narcotics trafficking, and intimidation of witnesses; and

c. Promoting and enhancing the enterprise as well as the Bloods street gang in general and the activities of its members and associates.

#### Means and Methods of the Enterprise

26. Among the means and methods by which the members and associates of the enterprise conducted and participated in the conduct of the affairs of the enterprise are the following:

a. Double II members attended regular, periodic meetings that were led by defendants TEWHAN BUTLER and/or QUADREE SMITH, or the highest-ranking non-incarcerated member of the set; at times, members paid monetary dues that were used to post bail or to purchase firearms for the benefit of the set and its members;

b. at these meetings, members of the set discussed the enterprise's affairs, such as the murdering of rival gang members or drug dealers, the stockpiling of illegal firearms and the retaliation against members believed to be cooperating with law enforcement;

c. Double II members maintained the power and authority of the set by instilling in rivals, potential rivals, and others in the community, a sense of fear which Double II members created by committing acts of extreme violence, including murders and numerous shootings, in and around a rival's territory, especially territory considered by Double II members to belong to the rival Crip gang;

d. additionally, Double II members maintained an area of drug territory by shooting or threatening to shoot non-members who sold narcotics in the area without permission of the set's leaders; this allowed Double II members to have unfettered access to lucrative drug locations in which to sell heroin, powder cocaine and cocaine base;

e. Double II members operated and profited from a multiple-year heroin business in which quantities of heroin were purchased from one or more sources of supply in New York City and then transported to East Orange, New Jersey to be sold on the street;

f. under the direction of defendants TEWHAN BUTLER and QUADREE SMITH, Double II members involved in the set's heroin business broke into four shifts of six hours each in order to sell the set's heroin twenty-four hours a day;

g. Double II members recruited juveniles to join the Bloods and used these juveniles to promote the set by dealing drugs and committing acts of violence;

h. members and associates of the Double II Set at times have used the enterprise's resources to advance their personal interests, and at times have assisted members of other Blood Sets and others to advance the interests of such other persons;

i. leaders and status members of the Double II Set in prison have given orders to kill, assault and attack individuals both in and out of prison as part of the ongoing affairs of the set; these types of orders have been passed on by means of mail, direct contact with other Bloods members, and by cellular telephones which were available to a leader of the Double II Set in prison;



j. members of the Double II Set were specifically directed to carry firearms, and in fact carried firearms in order to protect themselves and to threaten others in order to maintain the interests of the criminal enterprise.

27. Additionally, certain members of the Double II Set distributed and trafficked in firearms which were purchased from, among other places, the State of Ohio and brought to New Jersey, where these firearms were distributed to members of the Double II Set, to other members of the Bloods and to other persons.

In violation of Title 18, United States Code, Section 1962(d).

COUNT TWO  
(Racketeering)

1. The allegations contained in paragraphs 1 through 22 and 25 through 27 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. From at least in or about 1993 through on or about October 14, 2004, in the District of New Jersey and elsewhere, defendants

TEWHAN BUTLER,  
a/k/a "Massacre,"  
a/k/a "Mass,"  
a/k/a "Bloody Mass,"  
a/k/a "Mubini,"  
a/k/a "101,"  
a/k/a "Superior,"  
QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"  
TITO STRONG,  
a/k/a "Bido,"  
a/k/a "Big Bido,"  
RAHMAN NICHOLS,  
a/k/a "Rock,"  
a/k/a "Minister of Information,"  
AMIR WINN,  
a/k/a "Young Gangster,"  
a/k/a "Y.G.,"  
CALVIN DAVIS,  
a/k/a "Calione"  
a/k/a "Balione,"  
DAVID ALSTON,  
a/k/a "Floco,"  
STEVEN BUTLER,  
a/k/a "Beezo,"  
a/k/a "Steezo,"  
SAMIR MOSES,  
a/k/a "Spit Vicious,"  
a/k/a "S.P.V.,"

a/k/a "S.P.,"  
ANTHONY WARD,  
a/k/a "P.B.,"  
a/k/a "Problem Child,"  
NASIR JOHNSON,  
a/k/a "Nas,"  
a/k/a "Bloody Nas,"  
TIEHEEN SMITH,  
a/k/a "X,"  
ROBERT SINGLETON,  
a/k/a "B.R.,"  
a/k/a "Lieutenant," and  
JAMAR HURD,  
a/k/a "Fox,"  
a/k/a "Lieutenant"

being persons employed by and associated with the Double II Set, which was engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly conduct and participate, directly and indirectly, in the conduct of the affairs of the Double II Set through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of the acts more fully described below.

#### The Pattern of Racketeering Activity

3. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), through which the defendants conducted the affairs of the enterprise included, but was not limited to, the Racketeering Acts set forth as Racketeering Act One through Thirty-Five.

#### RACKETEERING ACT ONE (Murder of B.W.)

4. On or about April 29, 2000, in the District of New Jersey and elsewhere, defendant QUADREE SMITH did purposely and knowingly cause the death and serious bodily injury resulting in death of another person, B.W., in violation of N.J.S.A. Section 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT TWO  
(Conspiracy to Rob and Robbery of C.H.)

5. Defendants CALVIN DAVIS and RAHMAN NICHOLS committed the following acts, either of which alone constitutes the commission of Racketeering Act Two:

a. Conspiracy to Rob C.H.

On or about June 9, 2000, in the District of New Jersey and elsewhere, defendants CALVIN DAVIS and RAHMAN NICHOLS did knowingly and intentionally conspire and agree with each other to forcibly rob another person, specifically C.H., in violation of N.J.S.A. Sections 2C:5-2 and 2C:15-1.

b. Robbery of C.H.

On or about June 9, 2000, in the District of New Jersey and elsewhere, defendants CALVIN DAVIS and RAHMAN NICHOLS did forcibly rob another person, specifically C.H., in violation of N.J.S.A. Sections 2C:2-6 and 2C:15-1.

RACKETEERING ACT THREE  
(Conspiracy and Attempt to Murder Another Person)

6. Defendant QUADREE SMITH committed the following acts, either of which alone constitutes the commission of Racketeering Act Three:

a. Conspiracy to Murder Another Person

On or about June 25, 2000, in the District of New Jersey and elsewhere, defendant QUADREE SMITH together with others, did knowingly and intentionally conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

b. Attempted Murder of Another Person

On or about June 25, 2000, in the District of New Jersey and elsewhere, defendant QUADREE SMITH did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, in violation of N.J.S.A. Sections 2C:2-6, 2C:5-1 and 2C:11-3(1) & (2).

RACKETEERING ACT FOUR  
(Attempted Murder of Another Person)

7. On or about August 29, 2001, in the District of New Jersey and elsewhere, defendant DAVID ALSTON did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT FIVE  
(Conspiracy and Two Attempts to Commit Murder)

8. Defendants TEWHAN BUTLER and QUADREE SMITH committed the following acts, any of which alone constitutes the commission of Racketeering Act Five:

a. Conspiracy to Murder Another Person

On or about October 21, 2001, in the District of New Jersey and elsewhere, defendants TEWHAN BUTLER and QUADREE SMITH, did knowingly and intentionally conspire and agree with each other and others to cause the death and serious bodily injury resulting in death of a person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

b. Attempted Murder of T.H.

On or about October 21, 2001, in the District of New Jersey and elsewhere, defendants TEWHAN BUTLER and QUADREE SMITH, together with others, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of T.H., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

c. Attempted Murder of E.M.

On or about October 21, 2001, in the District of New Jersey and elsewhere, defendants TEWHAN BUTLER and QUADREE SMITH, together with others, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of E.M., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT SIX  
(Conspiracy to Murder, Murder of E.L.  
and Three Attempted Murders)

9. Defendant ANTHONY WARD committed the following acts, any of which alone constitutes the commission of Racketeering Act Six:

a. Conspiracy to Commit Murder

On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant ANTHONY WARD did knowingly and intentionally conspire with at least one other to cause the death and serious bodily injury resulting in death of a person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

b. Attempted Murder of Unknown Persons

On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant ANTHONY WARD together with at least one other, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

c. Attempted Murder of K.M.

On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant ANTHONY WARD together with at least one other, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another

person, K.M., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

d. Attempted Murder of T.H.

On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant ANTHONY WARD together with at least one other, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, T.H., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

e. Attempted Murder of L.J.

On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant ANTHONY WARD together with at least one other, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, L.J., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

f. Murder of E.L.

On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant ANTHONY WARD together with at least one other, did purposely and knowingly cause the death and serious bodily injury resulting in death of another person, specifically E.L., in violation of N.J.S.A. Sections 2C:2-6 and 2C:11-3(1) & (2).



RACKETEERING ACT SEVEN  
(Conspiracy and Attempt to Murder J.L.)

10. Defendants QUADREE SMITH, STEVEN BUTLER and ANTHONY WARD committed the following acts, either of which alone constitutes the commission of Racketeering Act Seven:

a. Conspiracy to Murder Another Person

During or around the Spring of 2002, in the District of New Jersey and elsewhere, defendants QUADREE SMITH, STEVEN BUTLER and ANTHONY WARD did knowingly and intentionally conspire and agree with each other and at least one other to cause the death and serious bodily injury resulting in death of a person, J.L., in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

b. Attempted Murder

During or around the Spring of 2002, in the District of New Jersey and elsewhere, defendants QUADREE SMITH, STEVEN BUTLER and ANTHONY WARD together with at least one other, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of a person, J.L., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT EIGHT  
(Robbery of S.P.)

11. During or around Spring of 2002, in the District of New Jersey and elsewhere, defendant TIEHEEN SMITH, did knowingly and intentionally forcibly rob another person, S.P., in violation of N.J.S.A. Sections 2C:2-6 and 2C:15-1.

RACKETEERING ACT NINE

(Conspiracy and Attempt to Commit Murder of A.W.)

12. Defendant TIEHEEN SMITH committed the following acts, either of which alone constitutes the commission of Racketeering Act Nine:

a. Conspiracy to Murder Another Person

On or about June 20, 2002, in the District of New Jersey and elsewhere, defendant TIEHEEN SMITH did knowingly and intentionally conspire and agree with at least one other to cause the death and serious bodily injury resulting in death of a person, A.W., in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

b. Attempted Murder

On or about June 20, 2002, in the District of New Jersey and elsewhere, defendant TIEHEEN SMITH did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of a person, A.W., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT TEN

(Attempted Murder of S.D.)

13. On or about June 28, 2002, in the District of New Jersey and elsewhere, defendant DAVID ALSTON did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of a person, S.D., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT ELEVEN  
(Attempted Murder of F.H.)

14. On or about June 30, 2002, in the District of New Jersey and elsewhere, defendant AMIR WINN did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of a person, F.H., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT TWELVE  
(Murder of L.B.)

15. On or about July 25, 2002, in the District of New Jersey and elsewhere, defendant AMIR WINN did purposely and knowingly cause the death and serious bodily injury resulting in death of a person, L.B., in violation of N.J.S.A. Sections 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT THIRTEEN  
(Attempted Murder of R.T.)

16. On or about August 2, 2002, in the District of New Jersey and elsewhere, defendant AMIR WINN did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of a person, R.T., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT FOURTEEN  
(Conspiracy to Rob and Robbery of M.H.)

17. Defendants TEWHAN BUTLER and RAHMAN NICHOLS committed the following acts, either of which alone constitutes the commission of Racketeering Act Fourteen:

a. Conspiracy to Rob M.H.

In or around August 2002, in the District of New Jersey and elsewhere, defendants TEWHAN BUTLER and RAHMAN NICHOLS did knowingly and intentionally conspire and agree with each other and others to forcibly rob another person, specifically M.H., in violation of N.J.S.A. Sections 2C:5-2 and 2C:15-1.

b. Robbery of M.H.

In or around August 2002, in the District of New Jersey and elsewhere, defendants TEWHAN BUTLER and RAHMAN NICHOLS did knowingly and intentionally forcibly rob another person, specifically M.H., in violation of N.J.S.A. Sections 2C:2-6 and 2C:15-1.

RACKETEERING ACT FIFTEEN

(Conspiracy to Rob and Robbery of Another Person)

18. Defendant SAMIR MOSES committed the following acts, either of which alone constitutes the commission of Racketeering Act Fifteen:

a. Conspiracy to Rob

On or about August 26, 2002, in the District of New Jersey and elsewhere, defendant SAMIR MOSES did knowingly and intentionally conspire and agree with others to forcibly rob another person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:15-1.

b. Robbery

On or about August 26, 2002, in the District of New Jersey and elsewhere, defendant SAMIR MOSES did knowingly and intentionally forcibly rob another person, in violation of N.J.S.A. Sections 2C:2-6 and 2C:15-1.

RACKETEERING ACT SIXTEEN  
(Murder of A.S.)

19. On or about January 19, 2003, in the District of New Jersey and elsewhere, defendant DAVID ALSTON did purposely and knowingly cause the death and serious bodily injury resulting in death of a person, A.S., in violation of N.J.S.A. Sections 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT SEVENTEEN  
(Conspiracy to Murder)

20. In or about April 2003, in the District of New Jersey and elsewhere, defendant QUADREE SMITH did knowingly and intentionally conspire and agree with at least one other to cause the death and serious bodily injury resulting in death of a person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

RACKETEERING ACT EIGHTEEN  
(Conspiracy to Murder)

21. On or about March 30, 2004, in the District of New Jersey and elsewhere, defendants ROBERT SINGLETON and JAMAR HURD did knowingly and intentionally conspire and agree with each other and at least one other to cause the death and serious

bodily injury resulting in death of a person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

RACKETEERING ACT NINETEEN  
(Conspiracy to Rob)

22. On or about April 17, 2004, in the District of New Jersey and elsewhere, defendant SAMIR MOSES did knowingly and intentionally conspire and agree with at least one other to forcibly rob another person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:15-1.

RACKETEERING ACT TWENTY  
(Murder of A.C.)

23. On or about April 17, 2004, in the District of New Jersey and elsewhere, defendant SAMIR MOSES did purposely and knowingly cause the death and serious bodily injury resulting in death of a person, A.C., in violation of N.J.S.A. Sections 2C:2-6 and 2C:11-3(1) & (2).

RACKETEERING ACT TWENTY-ONE  
(Conspiracy to Commit Arson and Arson)

24. Defendant SAMIR MOSES committed the following acts, either of which alone constitutes the commission of Racketeering Act Twenty-One:

a. Conspiracy to Commit Arson

On or about April 17, 2004, in the District of New Jersey and elsewhere, defendant SAMIR MOSES did knowingly and intentionally conspire and agree with at least one other to purposely start a fire with the purpose of destroying a

structure, specifically, a vehicle, of another, in violation of N.J.S.A. Sections 2C:5-2 and 2C:17-1(a)(2).

b. Arson

On or about April 17, 2004, in the District of New Jersey and elsewhere, defendant SAMIR MOSES did purposely start a fire with the purpose of destroying a structure, specifically, a vehicle, of another, in violation of N.J.S.A. Sections 2C:2-6 and 2C:17-1(a)(2).

RACKETEERING ACT TWENTY-TWO  
(Heroin Distribution Conspiracy)

25. Between in or about 2000 and in or about 2003, within the District of New Jersey and elsewhere, defendants TEWHAN BUTLER, QUADREE SMITH, TITO STRONG, RAHMAN NICHOLS, AMIR WINN, CALVIN DAVIS, DAVID ALSTON, STEVEN BUTLER, NASIR JOHNSON, and ANTHONY WARD did knowingly and intentionally conspire with each other and with others to distribute and possess with intent to distribute in excess of one kilogram of heroin, a Schedule I narcotic drug controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii) and 846.

RACKETEERING ACTS TWENTY-THREE THROUGH THIRTY-FIVE  
(Individual Narcotics Sales)

26. On or about the dates listed below, at Essex County, in the District of New Jersey, and elsewhere, the following defendants did knowingly and intentionally distribute and possess with the intent to distribute, and aid and abet the distribution of, a quantity of cocaine, a Schedule II narcotic drug controlled

substance, or a quantity of heroin, a Schedule I narcotic drug controlled substance, as indicated below:

<u>ACT</u>	<u>DATE</u>	<u>DEFENDANT(s)</u>	<u>A QUANTITY OF</u>
23	5/10/02	TEWHAN BUTLER	heroin
24	5/22/02	TEWHAN BUTLER	
		STEVEN BUTLER	heroin
25	5/24/02	DAVID ALSTON	cocaine-base
26	5/31/02	QUADREE SMITH	heroin
27	6/5/02	TEWHAN BUTLER	
		STEVEN BUTLER	heroin
28	6/19/02	CALVIN DAVIS	heroin
29	7/17/02	NASIR JOHNSON	heroin
30	4/21/03	TITO STRONG	heroin
31	10/15/03	CALVIN DAVIS	heroin
32	3/5/04	JAMAR HURD	cocaine-base
33	3/11/04	TERRANCE OLIVER	cocaine-base



34            4/7/04            ROBERT SINGLETON        heroin

35            4/20/04            ROBERT SINGLETON        heroin

Each in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

All of which was in violation of Title 18, United States code, Section 1962(c).

COUNTS THREE THROUGH THIRTY-THREE  
(Violent Crimes In Aid of Racketeering)

Introduction to Counts Relating to the  
Commission of Violent Crimes in Aid of Racketeering

1. The allegations contained in paragraphs 1 through 22 and 25 through 27 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. At all times relevant to this Superseding Indictment, in the District of New Jersey and elsewhere, the defendants set forth in Counts 3 through 28 were members or associates of the Double II Set, as more fully described in paragraphs 1 through 3 and 6 through 27 of Count One. This criminal organization constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate commerce.

3. At all times relevant to this Superseding Indictment, the Double II Bloods, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely:

a. acts involving murder, robbery and arson under the laws of the state of New Jersey; and

b. narcotics distribution and conspiracy to commit narcotics distribution, in violation of Title 21, United States Code, Sections 841 and 846.

COUNT THREE  
(Murder Conspiracy)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of

Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about June 25, 2000, in the District of New Jersey and elsewhere, defendant

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, contrary to N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Section 1959(a)(5).

COUNT FOUR  
(Attempted Murder)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of

Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about June 25, 2000, in the District of New Jersey and elsewhere, defendant

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, contrary to N.J.S.A. Sections 2C:2-6, 2C:5-1 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT FIVE  
(Assault With a Dangerous Weapon)

1. Paragraphs 1 through 3 of the Introduction to Counts

Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about June 25, 2000, in the District of New Jersey and elsewhere, defendant

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person, S.W., with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT SIX  
(Murder Conspiracy)

1. Paragraphs 1 through 3 of the Introduction to Counts

Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about October 21, 2001, in the District of New Jersey and elsewhere, defendants

TEWHAN BUTLER,  
a/k/a "Massacre,"  
a/k/a "Mass,"  
a/k/a "Bloody Mass,"  
a/k/a "Mubini,"  
a/k/a "101,"  
a/k/a "Superior,"  
QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"  
JABIR JONES,  
a/k/a "Hova," and  
HOWARD WRIGHT,  
a/k/a "Affateen Bey,"  
a/k/a "Murder"

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally conspire and agree with each other and others to cause the death and serious bodily injury resulting in death of a person, contrary to N.J.S.A. Sections 2C:5-2 and 2C:11-3(1)&(2).

In violation of Title 18, United States Code, Section 1959(a)(5).

COUNT SEVEN  
(Attempted Murder of T.H.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about October 21, 2001, in the District of New Jersey and elsewhere, defendants

TEWHAN BUTLER,  
a/k/a "Massacre,"  
a/k/a "Mass,"  
a/k/a "Bloody Mass,"  
a/k/a "Mubini,"  
a/k/a "101,"  
a/k/a "Superior,"  
QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General," and  
JABIR JONES,  
a/k/a "Hova,"

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of T.H., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT EIGHT

(Assault of T.H. With A Dangerous Weapon)

1. Paragraphs 1 through 3 of the Introduction to Counts



Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about October 21, 2001, in the District of New Jersey and elsewhere, defendants

TEWHAN BUTLER,  
a/k/a "Massacre,"  
a/k/a "Mass,"  
a/k/a "Bloody Mass,"  
a/k/a "Mubini,"  
a/k/a "101,"  
a/k/a "Superior,"  
QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General," and  
JABIR JONES,  
a/k/a "Hova,"

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person, T.H., with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT NINE  
(Attempted Murder of E.M.)

1. Paragraphs 1 through 3 of the Introduction to Counts

Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about October 21, 2001, in the District of New Jersey and elsewhere, defendants

TEWHAN BUTLER,  
a/k/a "Massacre,"  
a/k/a "Mass,"  
a/k/a "Bloody Mass,"  
a/k/a "Mubini,"  
a/k/a "101,"  
a/k/a "Superior,"  
QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General," and  
HOWARD WRIGHT,  
a/k/a "Affateen Bey,"  
a/k/a "Murder"

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of E.M., contrary to N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TEN

(Assault of E.M. with A Dangerous Weapon)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about October 21, 2001, in the District of New Jersey and elsewhere, defendants

TEWHAN BUTLER,  
a/k/a "Massacre,"  
a/k/a "Mass,"  
a/k/a "Bloody Mass,"  
a/k/a "Mubini,"  
a/k/a "101,"  
a/k/a "Superior,"  
QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General," and  
HOWARD WRIGHT,  
a/k/a "Affateen Bey,"  
a/k/a "Murder"

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person, E.M., with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT ELEVEN  
(Murder Conspiracy)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant

ANTHONY WARD  
a/k/a "P.B.,"  
a/k/a "Problem Child,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally conspire and agree with at least one other to cause the death and serious bodily injury resulting in death of a person, contrary to N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TWELVE  
(Attempted Murder)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 22, 2002, in the District of New Jersey and elsewhere, defendants

ANTHONY WARD,  
a/k/a "Problem Child,"

a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT THIRTEEN

(Attempted Murder of K.M.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 22, 2002, in the District of New Jersey and elsewhere, defendants

ANTHONY WARD,

a/k/a "Problem Child,"  
a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, K.M., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT FOURTEEN

(Assault With A Dangerous Weapon - K.M.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant



ANTHONY WARD,  
a/k/a "Problem Child,"  
a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person, K.M., with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT FIFTEEN  
(Attempted Murder of T.H.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 22, 2002, in the District of New Jersey and elsewhere, defendants

ANTHONY WARD,  
a/k/a "Problem Child,"  
a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, T.H., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT SIXTEEN

(Assault With A Dangerous Weapon - T.H.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant

ANTHONY WARD,  
a/k/a "Problem Child,"  
a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person, T.H., with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT SEVENTEEN  
(Attempted Murder of L.J.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 22, 2002, in the District of New Jersey and elsewhere, defendants

ANTHONY WARD,  
a/k/a "Problem Child,"  
a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, L.J. , in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT EIGHTEEN

(Assault of L.J. With A Dangerous Weapon)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 22, 2002, in the District of New Jersey and elsewhere, defendant

ANTHONY WARD,  
a/k/a "Problem Child,"  
a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person, L.J., with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT NINETEEN  
(Murder of E.L.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 22, 2002, in the District of New Jersey and elsewhere, defendants

ANTHONY WARD,  
a/k/a "Problem Child,"  
a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did purposely and knowingly cause the death and serious bodily injury resulting in death of another person, E.L., in violation of N.J.S.A. Sections 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT TWENTY  
(Murder Conspiracy - J.L.)

1. Paragraphs 1 through 3 of the Introduction to Counts

Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. During or around the Spring of 2002, in the District of New Jersey and elsewhere, defendants

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"  
STEVEN BUTLER,  
a/k/a "Beezo,"  
a/k/a "Steezo," and  
ANTHONY WARD,  
a/k/a "Problem Child,"  
a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally conspire and agree with each other and others to cause the death and serious bodily injury resulting in death of a person, J.L., in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TWENTY-ONE  
(Attempted Murder of J.L.)

1. Paragraphs 1 through 3 of the Introduction to Counts

Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. During or around the Spring of 2002, in the District of New Jersey and elsewhere, defendants

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"  
STEVEN BUTLER,  
a/k/a "Beezo,"  
a/k/a "Steezo," and  
ANTHONY WARD,  
a/k/a "Problem Child,"  
a/k/a "P.B."

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of a person, J.L., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TWENTY-TWO  
(Murder Conspiracy)

1. Paragraphs 1 through 3 of the Introduction to Counts



Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. During or around the Spring of 2002, in the District of New Jersey and elsewhere, defendant

BAATIN MORGAN,  
a/k/a "Baatin Hargrove,"  
a/k/a "Bat,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally conspire and agree with each other and others to cause the death and serious bodily injury resulting in death of a person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TWENTY-THREE  
(Attempted Murder)

1. Paragraphs 1 through 3 of the Introduction to Counts

Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. During or around the Spring of 2002, in the District of New Jersey and elsewhere, defendants

BAATIN MORGAN,  
a/k/a "Baatin Hargrove,"  
a/k/a "Bat,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of a person, in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TWENTY-FOUR  
(Conspiracy to Murder - A.W.)

1. Paragraphs 1 through 3 of the Introduction to Counts

Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about June 20, 2002, in the District of New Jersey and elsewhere, defendant

TIEHEEN SMITH  
a/k/a "X"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, knowingly and intentionally conspired and agreed with others to cause the death and serious bodily injury resulting in death of a person, A.W., contrary to N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TWENTY-FIVE  
(Attempted Murder of A.W.)

1. Paragraphs 1 through 3 of the Introduction to Counts

Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about June 20, 2002, in the District of New Jersey and elsewhere, defendants

TIEHEEN SMITH,  
a/k/a "X,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, A.W., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TWENTY-SIX  
(Assault of A.W. With A Dangerous Weapon)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about June 20, 2002, in the District of New Jersey and elsewhere, defendant

TIEHEEN SMITH,  
a/k/a "X,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person, A.W., with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT TWENTY-SEVEN

(Attempted Murder of S.D.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about June 28, 2002, in the District of New Jersey and elsewhere, defendant

DAVID ALSTON,  
a/k/a "Floco,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of a person, S.D., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TWENTY-EIGHT

(Attempted Murder of F.H.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about June 30, 2002, in the District of New Jersey and elsewhere, defendant

AMIR WINN,  
a/k/a "Young Gangster,"  
a/k/a "Y.G.,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of a person, F.H., in violation of N.J.S.A. Sections 2C:5-1, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TWENTY-NINE

(Assault of F.H. With A Dangerous Weapon)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about June 30, 2002, in the District of New Jersey and elsewhere, defendant

AMIR WINN,  
a/k/a "Young Gangster,"  
a/k/a "Y.G.,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person, F.H., with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.



COUNT THIRTY  
(Conspiracy to Murder)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. In or about April 2003, in the District of New Jersey and elsewhere, defendant

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, knowingly and intentionally conspired and agreed with others to cause the death and serious bodily injury resulting in death of a person, contrary to N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT THIRTY-ONE  
(Assault of S.D. With A Dangerous Weapon)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about August 19, 2003, in the District of New Jersey and elsewhere, defendants

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General," and  
CHYQUIN AUSTIN,  
a/k/a "Q.B."

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person, S.D., with a dangerous weapon, specifically a sharp object, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT THIRTY-TWO  
(Conspiracy to Assault S.D. With A Dangerous Weapon)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about August 19, 2003, in the District of New Jersey and elsewhere, defendants

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General," and  
CHYQUIN AUSTIN,  
a/k/a "Q.B."

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally conspire with each other and others to assault another person, S.D., with a dangerous weapon, specifically a sharp object, contrary to N.J.S.A. Sections 2C:5-2 and 2C:12-1.

In violation of Title 18, United States Code, Section 1959(a)(6).

COUNT THIRTY-THREE  
(Conspiracy to Murder)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about March 30, 2004, in the District of New Jersey and elsewhere, defendants

JAMAR HURD,  
a/k/a "Fox,"  
a/k/a "Lieutenant," and  
ROBERT SINGLETON,  
a/k/a "B.R."  
a/k/a "Lieutenant," and

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, knowingly and intentionally conspired and agreed with each other and with others to cause the death and serious bodily injury resulting in death of a person, contrary to N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5).

COUNT THIRTY-FOUR  
(Murder of A.C.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 17, 2004, in the District of New Jersey and elsewhere, defendant

SAMIR MOSES,  
a/k/a "Spit Vicious,"  
a/k/a "S.P.V.,"  
a/k/a "S.P."

for the purpose of gaining entrance into, maintaining and increasing his position in the Double II Set, which enterprise was engaged in racketeering activity, did purposely and knowingly cause the death and serious bodily injury resulting in death of a person, A.C. contrary to N.J.S.A. Sections 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT THIRTY-FIVE

(Conspiracy to Assault With A Dangerous Weapon)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 27, 2004, in the District of New Jersey and elsewhere, defendants

BAATIN MORGAN,  
a/k/a "Baatin Hargrove,"  
a/k/a "Bat," and  
TERRANCE OLIVER  
a/k/a "Big Red,"  
a/k/a "Sergeant,"

for the purpose of gaining entrance into, maintaining and increasing their positions in the Double II Set, which enterprise was engaged in racketeering activity, did knowingly and intentionally conspire with each other and others to assault another person, with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:5-2 and 2C:12-1.

In violation of Title 18, United States Code, Sections 1959(a)(6) and 2.

COUNTS THIRTY-SIX THROUGH FORTY-NINE  
(Offenses Related to Firearms)

COUNT THIRTY-SIX  
(Possession, Use and Discharge of a Firearm for Violent Crime)

On or about June 25, 2000, in the District of New  
Jersey and elsewhere, defendant

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"

during and in relation to a crime of violence, specifically the  
Attempted Murder alleged in Count Four, and the Assault With A  
Dangerous Weapon alleged in Count Five herein, did knowingly and  
intentionally use, carry, discharge and, in furtherance of such  
crime, possess a firearm.

In violation of Title 18, United States Code, Sections  
924(c)(1)(A)(i) and (iii), and 2.

COUNT THIRTY-SEVEN  
(Possession, Use and Discharge of a Firearm for Violent Crime)

On or about October 21, 2001, in the District of New Jersey and elsewhere, defendants

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General," and  
JABIR JONES,  
a/k/a "Hova,"

during and in relation to a crime of violence, specifically the Attempted Murder of T.H. alleged in Count Seven, and the Assault of T.H. With A Dangerous Weapon alleged in Count Eight herein, did knowingly and intentionally use, carry, discharge and, in furtherance of such crime, possess a firearm

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (iii), and 2.

COUNT THIRTY-EIGHT  
(Possession, Use and Discharge of a Firearm for Violent Crime)

On or about October 21, 2001, in the District of New Jersey and elsewhere, defendant



HOWARD WRIGHT,  
a/k/a "Affateen Bey,"  
a/k/a "Murder"

during and in relation to a crime of violence, specifically the Attempted Murder of E.M. alleged in Count Nine and the Assault of E.M. with a Dangerous Weapon alleged in Count Ten herein, did knowingly and intentionally use, carry, discharge and, in furtherance of such crime, possess a firearm

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (iii), and 2.

COUNT THIRTY-NINE  
(Possession, Use and Discharge of a Firearm for Violent Crime)

During and around Spring 2002, in the District of New Jersey and elsewhere, defendants

QUADREE SMITH,  
a/k/a "Trouble,"

a/k/a "Nuff,"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"  
STEVEN BUTLER,  
a/k/a "Beezo,"  
a/k/a "Steezo," and  
ANTHONY WARD,  
a/k/a "Problem Child,"  
a/k/a "P.B."

during and in relation to a crime of violence, specifically the Attempted Murder alleged in Count Twenty-One herein, did knowingly and intentionally use, carry, discharge and, in furtherance of such crime, possess a firearm

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (iii), and 2.

COUNT FORTY  
(Theft Of A Firearm)

In or about June 2002, in the District of New Jersey and elsewhere, defendant

TIEHEEN SMITH,  
a/k/a "X"

stole a firearm which was moving and had moved in interstate and foreign commerce from another person.

In violation of Title 18, United States Code, Sections 924(1) and 2.

COUNT FORTY-ONE

(Possession, Use and Discharge of a Firearm for Violent Crime)

On or about June 20, 2002, in the District of New Jersey and elsewhere, defendant

TIEHEEN SMITH,  
a/k/a "X"

during and in relation to a crime of violence, specifically the Attempted Murder alleged in Count Twenty-Five and the Assault

With A Dangerous Weapon alleged in Count Twenty-Six herein, did knowingly and intentionally use, carry, discharge and, in furtherance of such crime, possess a firearm

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (iii), and 2.

COUNT FORTY-TWO

(Possession, Use and Discharge of a Firearm for Violent Crime)

On or about June 28, 2002, in the District of New Jersey and elsewhere, defendant

DAVID ALSTON  
a/k/a "Floco,"

during and in relation to a crime of violence, specifically the Attempted Murder of another person contained in Count Twenty-Seven herein, did knowingly and intentionally use, carry, discharge and, in furtherance of such crime, possess a firearm

In violation of Title 18, United States Code, Sections  
924(c)(1)(A)(i) and (iii), and 2.

COUNT FORTY-THREE

(Possession, Use and Discharge of a Firearm for Violent Crime)

On or about June 30, 2002, in the District of New Jersey  
and elsewhere, defendant

AMIR WINN  
a/k/a "Young Gangster,"  
a/k/a "Y.G.,"

during and in relation to a crime of violence, specifically the  
Attempted Murder of another person contained in Count Twenty-  
Eight and the Assault with a Dangerous Weapon alleged in Count

Twenty-Nine herein, did knowingly and intentionally use, carry, discharge and, in furtherance of such crime, possess a firearm

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (iii), and 2.

COUNT FORTY-FOUR

(Possession of a Firearm for Drug Trafficking Crime)

On or about October 15, 2003, in Essex County, in the District of New Jersey and elsewhere, the defendant

CALVIN DAVIS  
a/k/a "Calione,"  
a/k/a "Balione,"

during and in relation to a drug trafficking crime, specifically the Conspiracy to Distribute Heroin alleged in Count Fifty-Three and the Possession of heroin with Intent to Distribute alleged in

Count Sixty-Two herein, for which he could be prosecuted in a Court of the United States, did knowingly and wilfully carry, and in furtherance of such crime, possess a firearm.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT FORTY-FIVE

(Use Of Firearm to Cause Death During Violent Crime)

On or about April 17, 2004, 2002, in the District of New Jersey and elsewhere, defendant

SAMIR MOSES,  
a/k/a "Spit Vicious,"  
a/k/a "S.P.V.,"  
a/k/a "S.P.

during and in relation to a crime of violence, specifically the Murder of A.C. alleged in Count Thirty-Two herein, did knowingly and intentionally use, carry, discharge, and through the use of such firearm caused the death of another person, A.C.

In violation of Title 18, United States Code, Sections  
924(c)(1)(A)(i) and (iii) and 924(i)(1) and 2.

COUNT FORTY-SIX

(Possession, Use and Discharge of a Firearm for Violent Crime)

On or about April 27, 2004, in the District of New  
Jersey and elsewhere, defendants

BAATIN MORGAN,  
a/k/a "Baatin Hargrove,"  
a/k/a "Bat," and  
TERRANCE OLIVER  
a/k/a "Big Red,"  
a/k/a "Sergeant,"

during and in relation to a crime of violence, specifically the  
Conspiracy to Commit Assault With a Dangerous Weapon alleged in  
Count Thirty-Five herein, did knowingly and intentionally carry  
and, in furtherance of such crime, possess a firearm



In violation of Title 18, United States Code, Sections  
924(c)(1)(A)(i) and 2.

COUNT FORTY-SEVEN

(Conspiracy to Deal Firearms Without a License)

1. From in or about February 2002 through on or about June  
18, 2002, in Essex County, in the District of New Jersey, and  
elsewhere, defendants

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General," and  
JAMES DILLARD

knowingly and willfully combined, conspired and agreed with each  
other and with others to engage in the business of dealing in

firearms without having a license to do so and, in the course of such business, to ship, transport, and receive firearms in interstate and foreign commerce, contrary to Title 18, United States Code, Section 922(a)(1)(A).

#### The Object of the Conspiracy

2. The object of the conspiracy was to obtain quantities of firearms in Ohio for resale in New Jersey for profit.

#### Overt Acts

3. In furtherance of this conspiracy and to effect its unlawful object, the following overt acts were committed in the District of New Jersey and elsewhere:

a. On or about February 23, 2002, defendant JAMES DILLARD sold five (5) firearms to straw purchaser T.J., who filled out false paperwork necessary for the transfer.

b. On or about February 27, 2002, defendant JAMES DILLARD sold six (6) firearms to straw purchaser T.J., who filled out false paperwork necessary for the transfer.

c. In or about February 2002, a Co-Conspirator (Co-Conspirator A) transported several of the firearms to New York from Ohio and telephoned a second Co-Conspirator (Co-Conspirator B) in New Jersey to transfer the firearms to Co-Conspirator B.

d. In or about February 2002, Co-Conspirator B traveled from New Jersey to New York and purchased several firearms from Co-Conspirator A.

e. In or about February 2002, Co-Conspirator B transported the firearms purchased from Co-Conspirator A to New Jersey and sold them to defendant QUADREE SMITH and one or more other members of the Double II Set of the Bloods.

f. In or about March or April 2002, Defendant QUADREE SMITH caused one or more members or associates of the Double II Set to travel from New Jersey to Ohio to purchase firearms from Co-Conspirator A.

g. In or about March or April 2002, Co-Conspirator B and one or more members of the Double II Set of the Bloods transported and shipped the firearms purchased from Co-Conspirator A back to New Jersey.

h. On or about April 13, 2002, defendant JAMES DILLARD sold nine (9) firearms to straw purchaser E.C., who filled out the paperwork necessary for the transfer.

i. On or about April 19, 2002, defendant JAMES DILLARD sold twenty-five (25) firearms to straw purchaser R.R., who filled out the paperwork necessary for the transfer.

j. Sometime between April 19, 2002 and April 22, 2002, in Essex County, New Jersey, defendant QUADREE SMITH sold a

Bryco 9mm firearm that he had purchased from Co-Conspirator B to "A.F.," a member of the Gangsta Killer Bloods in New Jersey.

k. On or about April 24, 2002, defendant JAMES DILLARD sold sixteen (16) firearms to straw purchaser E.C., who filled out false paperwork necessary for the transfer.

l. On or about April 24, 2002, defendant JAMES DILLARD sold fifteen (15) firearms to straw purchaser R.R., who filled out false paperwork necessary for the transfer.

m. In or about April 2002, Co-Conspirator B and one or more members or associates of the Double II Set traveled to Ohio from New Jersey to purchase firearms from Co-Conspirator A with money supplied by defendant QUADREE SMITH.

n. In or about April 2002, Co-Conspirator B and one or more members or associates of the Double II Set transported and shipped the firearms purchased from Co-Conspirator A back to New Jersey.

In violation of Title 18, United States Code, Section 371.

COUNT FORTY-EIGHT  
(Dealing in Firearms Without a License)

1. Paragraphs 1 through 3 of Count Forty Seven are realleged and incorporated as if fully set forth herein.

2. From in or about February 2002 through on or about June 18, 2002, in Essex County, in the District of New Jersey, and elsewhere, defendants

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General," and  
JAMES DILLARD

did knowingly and willfully engage in the business of dealing in firearms without having a license to do so and, in the course of such business, shipped, transported, and received firearms in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

COUNT FORTY-NINE  
(Felon in Possession of a Firearm)

In or about April 2002, in Essex County, in the  
District of New Jersey, and elsewhere, the defendant,

QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"

having been convicted of a crime punishable by imprisonment for a  
term exceeding one year in a court in the State of New Jersey,  
did knowingly possess in and affecting commerce a firearm,  
namely, one 9MM Bryco firearm, bearing serial number 1509298.

In violation of Title 18, United States Code, Sections  
922(g)(1) and 2.

COUNT FIFTY  
(Felon in Possession of a Firearm)

On or about October 15, 2003, in Essex County, in the  
District of New Jersey and elsewhere, defendant

CALVIN DAVIS  
a/k/a "Calione,"  
a/k/a "Balione,"

having been convicted of a crime punishable by imprisonment for a  
term exceeding one year in a court in the State of New Jersey,  
did knowingly possess in and affecting commerce a firearm, namely  
one loaded .380 caliber Lorcin pistol.

In violation of Title 18, United States Code, Sections  
922(g)(1) and 2.

COUNT FIFTY-ONE  
(Felon in Possession of a Firearm)

On or about April 27, 2004, in Essex County, in the  
District of New Jersey and elsewhere, the defendant

BAATIN MORGAN,  
a/k/a "Baatin Hargrove,"  
a/k/a "Bat,"

having been convicted of a crime punishable by imprisonment for a  
term exceeding one year in a court in the State of New Jersey,  
did knowingly possess in and affecting interstate commerce a  
firearm, namely one Remington Rand, model 1911A1, .45 caliber  
handgun.

In violation of Title 18, United States Code, Section(s)  
922(g)(1) and 2.



COUNT FIFTY-TWO  
(Felon in Possession of a Firearm)

On or about May 5, 2004, in Essex County, in the  
District of New Jersey and elsewhere, the defendant

ROBERT SINGLETON,  
a/k/a "B.R.,"  
a/k/a "Lieutenant,"

having been convicted of a crime punishable by imprisonment for a  
term exceeding one year in a court in the State of New Jersey,  
did knowingly possess in and affecting interstate commerce a  
firearm.

In violation of Title 18, United States Code, Section(s)  
922(g)(1) and 2.

COUNT FIFTY-THREE  
(Heroin Distribution Conspiracy)

Between in or about 2000 and in or about 2003, within  
the District of New Jersey and elsewhere, defendants

TEWHAN BUTLER,  
a/k/a "Massacre,"  
a/k/a "Mass,"  
a/k/a "Bloody Mass,"  
a/k/a "Mubini,"  
a/k/a "101,"  
a/k/a "Superior,"  
QUADREE SMITH,  
a/k/a "Trouble,"  
a/k/a "Nuff"  
a/k/a "Syheem Littlejohn,"  
a/k/a "Raheem Sparks,"  
a/k/a "Jay,"  
a/k/a "105,"  
a/k/a "Five-Star General,"  
TITO STRONG,  
a/k/a "Bido,"  
a/k/a "Big Bido,"  
RAHMAN NICHOLS,  
a/k/a "Rock,"  
AMIR WINN,  
a/k/a "Young Gangster,"  
a/k/a "Y.G.,"  
CALVIN DAVIS,  
a/k/a "Calione"  
a/k/a "Balione,"  
DAVID ALSTON,  
a/k/a "Floco,"  
STEVEN BUTLER,  
a/k/a "Beezo,"  
a/k/a "Steezo,"  
ANTHONY WARD,  
a/k/a "P.B.,"  
a/k/a "Problem Child," and  
NASIR JOHNSON,  
a/k/a "Nas,"  
a/k/a "Bloody Nas,"

did knowingly and intentionally conspire with each other and with  
others to distribute and possess with intent to distribute in  
excess of one kilogram of heroin, a Schedule I narcotic drug

controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

In violation of Title 21, United States Code, Section 846.

COUNTS FIFTY-FOUR THROUGH SIXTY-FIVE  
(Individual Narcotics Sales)

On or about the dates listed below, at Essex County, in the District of New Jersey, and elsewhere, the following defendants did knowingly and intentionally distribute and possess with the intent to distribute, and aid and abet the distribution of, a quantity of cocaine, a Schedule II narcotic drug controlled substance, or a quantity of heroin, a Schedule I narcotic drug controlled substance, as indicated below:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT(s)</u>	<u>A QUANTITY OF</u>
54	5/10/02	TEWHAN BUTLER	heroin
55	5/22/02	TEWHAN BUTLER	
		STEVEN BUTLER	heroin
56	5/24/02	DAVID ALSTON	cocaine-base
57	5/31/02	QUADREE SMITH	heroin
58	6/5/02	TEWHAN BUTLER	
		STEVEN BUTLER	heroin
59	6/19/02	CALVIN DAVIS	heroin
60	7/17/02	NASIR JOHNSON	heroin

61	4/21/03	TITO STRONG	heroin
62	10/15/03	CALVIN DAVIS	heroin
63	3/11/04	TERRANCE OLIVER	cocaine-base
64	4/7/04	ROBERT SINGLETON	heroin
65	4/20/04	ROBERT SINGLETON	heroin

Each in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIXTY-SIX

(Jamar Hurd Sells over 50 Grams of Cocaine-Base)

On or about March 5, 2004, at Essex County, in the  
District of New Jersey and elsewhere, defendant

JAMAR HURD,  
a/k/a "Fox,"  
a/k/a "Lieutenant,"

did knowingly and intentionally distribute and possess with the  
intent to distribute in excess of 50 grams of a mixture or  
substance containing cocaine-base.

In violation of Title 21, United States Code, Sections  
841(a)(1) and (b)(1)(A)(iii), and 18 United States Code, Section  
2.

A TRUE BILL

---

FOREPERSON

---

CHRISTOPHER J. CHRISTIE  
UNITED STATES ATTORNEY